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James T. Hannon
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U S WEST

EX PARTE

January 16, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: CC Docket No. 96-128, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

Pursuant to Section 1.1206(b)(1) of the Rules of the Federal Communications Commission, 47 C.F.R. Section 1.1206(b)(1), enclosed for filing are two copies of an Ex Parte letter and attachments that are being transmitted today to Mr. John Muleta, Deputy Chief of the Common Carrier Bureau.

Please see that these materials are associated with the appropriate docket and become part of the record for this proceeding. Thank you in advance for your assistance with this matter.

Finally, please also note that a third copy of this correspondence has been included with this package so that it can be stamped as received and returned to the messenger who has been instructed to wait for it.

Respectfully,

James T. Hannon

James T. Hannon

Attachments

c: J. Muleta

No. of Copies rec'd 0+2
List A B C D E

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January 16, 1998

John Muleta, Esquire
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 96-128, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Mr. Muleta,

On December 23, 1997, Michael Kellogg, Counsel for the RBOC Payphone Coalition, and Ms. BB Nugent of U S WEST's Washington D.C. office, met with you to discuss U S WEST's decision to convert to Flex ANI in order to satisfy the Commission's requirement that payphones transmit specific coding digits for per-call compensation purposes.

As you know, U S WEST had previously intended to satisfy this requirement through the use of OLNS which U S WEST implemented to comply with the fraud control requirements of CC Docket No. 91-35.[1] Until last fall, U S WEST was of the opinion the Commission would find OLNS to be an acceptable means of satisfying both the requirements of CC Docket Nos. 91-35 and 96-128. The language of the Commission's October 7, 1997 Waiver Order (which waived the payphone-specific digit requirement until March 9, 1998) convinced U S WEST that the Commission would not find OLNS to be a satisfactory means of complying with the payphone-specific digit requirement.

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[1] OLNS has been available for anti-fraud purposes since September 15, 1997 when U S WEST Communications Transmittal No. 858 took effect. On September 30, 1997, U S WEST and certain other LECs (who elected to use OLNS to satisfy their obligations under CC Docket No. 91-35) offered to provide free access to OLNS to IXCs for per-call compensation purposes until the Commission had an opportunity to address the payphone-specific digit issue. See Letter of Michael Kellogg, counsel for the LEC ANI Coalition, to John Muleta, Acting Deputy Chief, Common Carrier Bureau, Federal Communications Commission, dated September 30, 1997.

Shortly after the issuance of the Waiver Order, U S WEST initiated an internal study to determine what was required to implement Flex ANI for payphones throughout its 14 state service area.[2] Unfortunately, U S WEST was still in the process of conducting its study on December 23, 1997, when Mr. Kellogg and Ms. Nugent met with you. As a result, Ms. Nugent was unable to provide you with any details on U S WEST's deployment of Flex ANI other than to indicate that U S WEST would be unable to fully implement Flex ANI prior to the expiration of the Commission's waiver on March 9, 1998.[3] She agreed to provide as much detail as possible on the status of U S WEST's Flex ANI deployment plans by mid-January.

The purpose of this letter is three-fold: 1) to provide the FCC with formal notification that U S WEST Communications intends to implement Flex ANI to comply with the Commission's requirement to provide payphone-specific digits for per-call compensation purposes; 2) to provide additional detail on U S WEST's Flex ANI implementation plans; and 3) to request an extension of the Commission's existing waiver of the payphone-specific digit requirement.

Summary of Implementation Plan

U S WEST's Flex ANI implementation efforts have been prioritized based on the number of Independent Payphone Service Provider ("IPSP") access lines (i.e., basic or "dumb" PAL lines) served by each U S WEST switch. This approach was used in order to ensure that IPSP lines are converted at the earliest possible date.[4] U S WEST expects that Flex ANI will be installed and available in switches serving approximately 90 percent of all IPSP lines by June 30, 1998.[5] Furthermore,

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[2] Concurrently, in order to streamline the implementation process U S WEST initiated discussions with switch vendors to determine which software upgrades and/or right to use (or "RTU") fees were required to provide Flex ANI capability in its switches.

[3] In an earlier filing U S WEST indicated that it would need additional time beyond March 9, 1998 to deploy alternative technology (e.g., Flex ANI) if OLNS were found to be an unacceptable means of satisfying the requirement to provide payphone-specific coding digits. See Reply of U S WEST, Inc., Petitions to Waive Payphone Coding Digit Requirements, CC Docket No. 96-128, filed November 6, 1997.

[4] The majority of U S WEST-owned payphones (i.e., 75.1 percent or 84,758 payphones as of December 31, 1997) use "smart" PAL lines and already transmit 27 which specifically identifies these lines as serving payphones. U S WEST is sensitive to the fact that the vast majority of IPSP payphones use "dumb" PAL lines which currently do not transmit payphone-specific coding digits.

[5] As of December 31, 1997, U S WEST Communications provided "dumb" PAL service to 86,060 payphones of which 28,092 were U S WEST payphones. U S WEST expects to have Flex ANI activated in switches serving slightly more than 90 percent of all "dumb" PAL lines by the end of June 1998.

U S WEST expects that more than 95 percent of all payphones served by U S WEST switches (i.e., both "smart" and "dumb" PAL lines) will be capable of transmitting payphone-specific digits by June 30, 1998.

IPSP payphone lines are not evenly distributed across U S WEST's territory but are concentrated in certain U S WEST's switches -- with half of U S WEST's switches (i.e., 745 switches) accounting for approximately 90 percent of all IPSP lines. The last 10 percent of IPSP payphone lines are served out of the other half of U S WEST's switches. U S WEST expects to have 99 percent of its "dumb" PAL lines equipped with Flex ANI capability by December 31, 1998.[6] U S WEST will make Flex ANI available to carriers on an office by office basis as soon as all necessary work is completed in a switch.[7]

Implementation Details

Switches

As of the end of 1996, U S WEST had 1483 switches in service including remote switches.[8] The following types and quantities of switches were installed in U S WEST's 14 state service area:

	Number of Switches
Lucent Technologies 5EESS	206
Lucent Technologies 1AESS	109
Northern Telecom DMS 100	140
Northern Telecom DMS10	126
Northern Telecom TOPS	14
Ericsson AXE Host	78
Remotes	810
Total Switches	1483

[6] Flex ANI should be available on all U S WEST "dumb" PAL lines no later than March 30, 1999.

[7] U S WEST's implementation of Flex ANI by itself is insufficient to allow Flex ANI to be used for per-call compensation purposes. Carriers must take steps to receive and use the payphone-specific digits. At a minimum, carriers must request that these digits be transmitted from a given U S WEST end office to the carrier's point of presence ("POP"). Only upon receiving such a request will U S WEST condition the trunks between its end office and the carriers' POP to transmit Flex ANI digits rather than 07. Needless to say, carriers must jointly test these trunks with U S WEST in order to ensure that Flex ANI is working properly. Clearly, not all carriers will choose to accept Flex ANI digits in order to comply with the requirement to pay per-call compensation to payphone service providers.

[8] ARMIS Report 43-07, Table 1.

Only four of these switches currently have the capability to transmit Flex ANI digits. While the Flex ANI feature is "resident" in the vast majority of U S WEST's other switches and may be activated with appropriate vendor authorization (including the payment of right to use fees),[9] it cannot be done immediately at "the flip of a switch". Attachment A contains a schematic showing the steps involved in activating and testing Flex ANI in U S WEST's switches by switch type.

Translations

Once Flex ANI software has been activated in a switch, the next step is to change line class codes ("LCCs") for each "dumb" PAL line served by a given switch. New LCCs (i.e., for "70" and "29") must be assigned to each type of "dumb" PAL line. Then LCCs must be loaded into each switch for all "dumb" PAL lines in order to instruct switches to transmit Flex ANI digits to all carriers electing to receive them.

In order to speed translations work, U S WEST intends to first implement the 70 code for all payphone lines including inmate phones. This will allow U S WEST to minimize the amount of time and manual intervention necessary to create and enter service orders to change LCCs. This approach allows U S WEST to change LCCs on all PAL lines in an end office using a mechanized service order process. Within a short time thereafter, U S WEST will manually convert all PAL lines which IPSPs have identified as inmate lines from 70 to the 29 code (i.e., the Flex ANI code specifically identified with inmate payphones).[10] At the same time, any

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[9] The Flex ANI feature is "resident" in all of the above switch types with the exception of the 1AESS where this software must be purchased separately from Lucent Technologies and loaded into each switch. While Flex ANI software may be resident in a switch, it may not be used to provide the Flex ANI feature without the payment of a RTU fee. Once the RTU fee is paid, the Flex ANI feature is activated through the use of a vendor-supplied password. The actual turn-up of the feature takes approximately 30 minutes in most switches after which testing is performed to ensure that the feature is operating properly. The procedures and time frames for paying RTUs and obtaining passwords vary between switch vendors. For example, the standard interval for receiving passwords from Nortel is three weeks while Lucent provides and activates passwords in real time.

The implementation process is quite a bit different for switches such as 1AESSs where the feature is not "resident" in the switch. In the case of the 1AESS, Flex ANI software must be purchased from Lucent Technologies and loaded into each switch. Once this is done, a Parameter Data Assembly ("PDA") run is required to activate the Flex ANI feature in an individual switch. Under normal conditions, this process takes from 12-14 weeks from feature identification to turn-up. U S WEST has already purchased all necessary software from Lucent Technologies to provide Flex ANI capability in 1AESS switches. Flex ANI software has been loaded and turned-up in 70 of U S WEST's 109 1AESS switches.

[10] U S WEST will notify IPSPs prior to converting "dumb" PAL lines in a switch to Flex ANI in order to allow IPSPs to make any necessary changes to inmate call management systems.

errors resulting from the mechanized service order process will be manually corrected and the appropriate LCCs will be re-input.

Translations work will be performed on a priority basis starting with the end offices with the largest numbers of IPSP PAL lines. Attachment B contains a schematic and an overview of the steps involved in changing line class codes for PAL lines.

Conclusion

The above details clearly demonstrate that U S WEST has made a good faith effort to comply with the Commission's requirement to provide payphone-specific digits and has shown that good cause exists to extend the existing waiver.[11]

Respectfully,

James T. Hannon

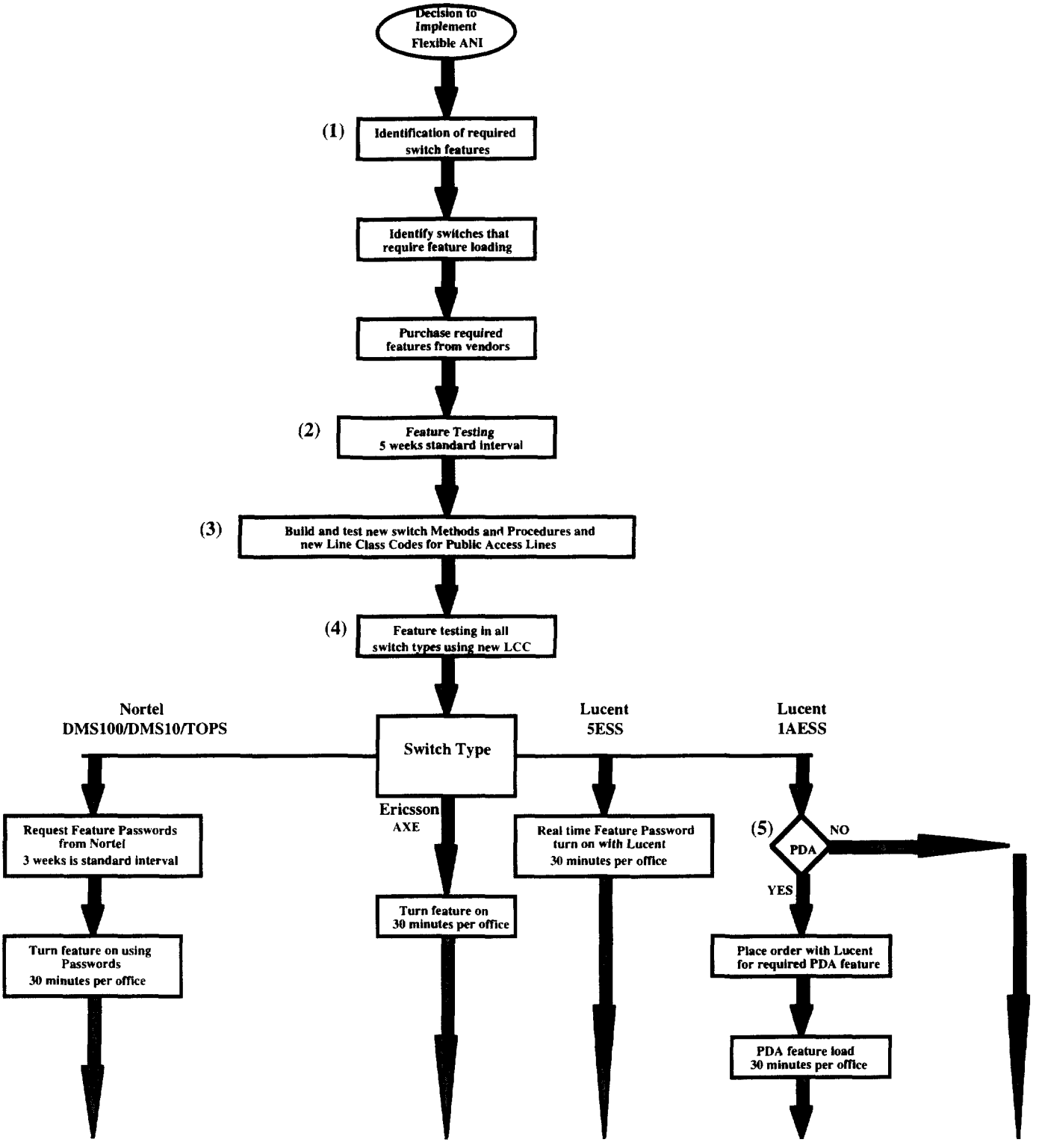
James T. Hannon

cc: Rose Crellin, FCC
Robert Spangler, FCC
Craig Stroup, FCC
Michael Kellogg, Kellogg, Huber, et al.

[11] The special circumstances associated with U S WEST's initial adoption of OLNS for the purpose of providing payphone-specific digits and its subsequent decision to deploy Flex ANI for this purpose (i.e., in order to address Commission concerns) are sufficient to justify an extension of the existing waiver under the prevailing legal standard. See WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969).

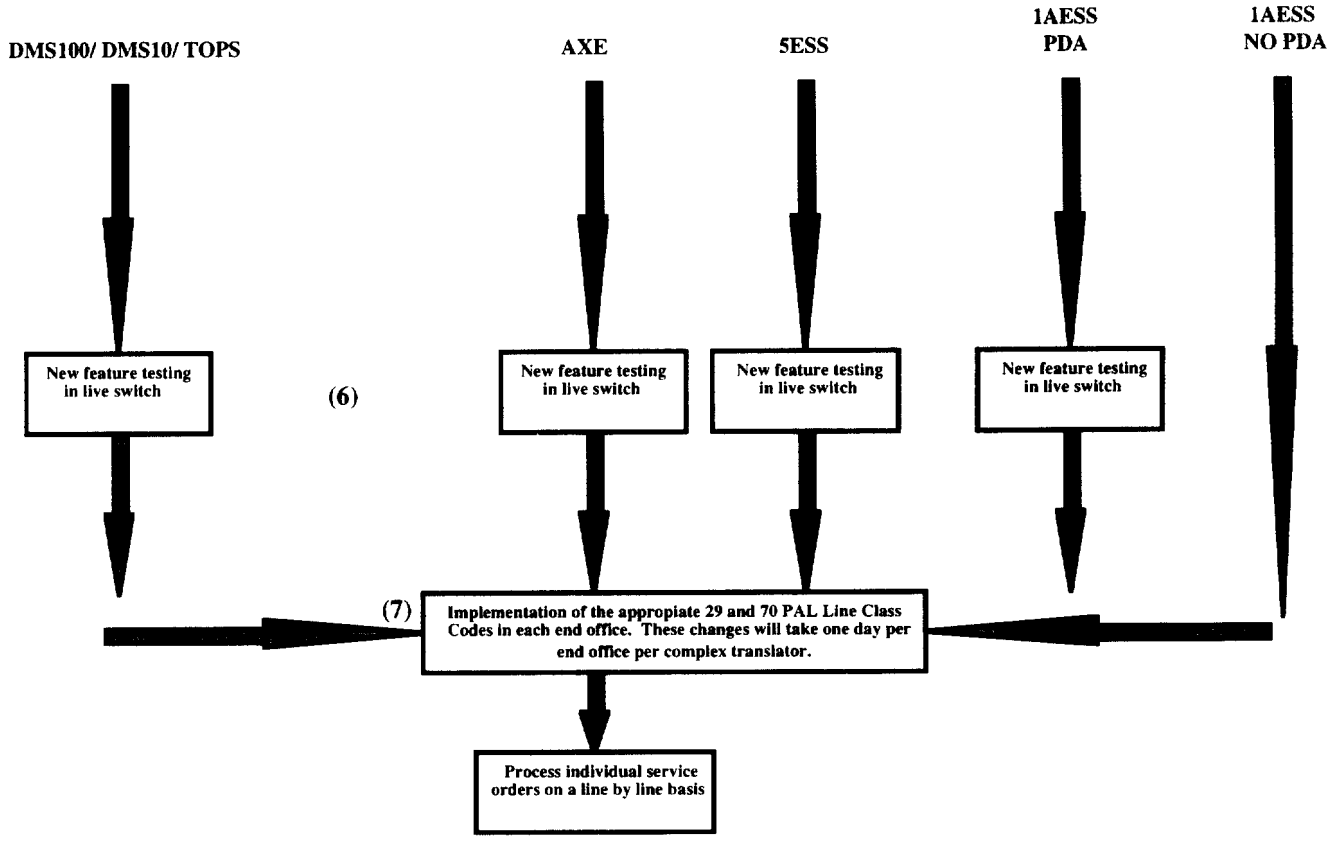
Attachment A

U S WEST Flexible ANI Network Standard Implementation Process



Process Continues On Following Page

Attachment A



Detailed information for referenced steps in above flow chart

(1) - Required Flexible ANI features by switch type:

A. Lucent Technologies 5ESS
   1) Secured Feature 038 (Flexible ANI Information Digit Assignment)
   2) Secured Feature 142 (Flexible ANI Provisioning Enhancements)

B. Lucent Technologies 1AESS
   1) Fast Feature 063 (Flexible Automatic Number Identification))
   2) Fast Feature 067 (Flex ANI Screen)

C. Northern Telecom DMS100
   1) Feature UDD00001 (US Direct Distance Dialing - Flexible Automatic Number Identification)

D. Northern Telecom DMS10
   1) Feature FLEXANI (Flexible Automatic Number Identification Digits)

E. Northern Telecom TOPS
   1) Feature ENSV0006 (Two Digit ANI TOPS Office)

F. Ericsson AXE Host
   1) Feature Flexible ANI

Attachment A

(2) - Feature Testing:

Testing the feature with an Interexchange Carrier (IEC) to test the functionality in the switch. This testing could begin after the product is completely defined and would take about 20 hours per switch type. The estimated time required to accomplish this is 5 weeks from request to completion.

(3) - Building and testing new switch Methods and Procedures as well as new Line Class Codes for PAL:

After feature testing is complete the methods and procedures would be written. The estimated time required to write methods and procedures for each switch type is 20 hours. At the same time the existing Line Class Codes (LCC's) that require an equivalent Flexible ANI LCC built will be identified. It will take about 30 minutes per new LCC to establish the new Flexible ANI LCC in the Standard Translation Application Guide. It is estimated that 176 total new LCC's will be required to accommodate Flexible ANI digits 29 and 70 across the entire U S WEST network.

(4) - Feature testing using new LCC's:

It is necessary to test the switch features and their interactions with the new Flexible ANI LCC's.

(5) - Parameter Data Assembly (PDA):

A PDA run is a process by which the purchaser requests a feature for an individual 1AESS switch. The vendor has to send U S WEST a tape backup copy of the existing information contained on that individual switch along with the new feature. Once the individual switch office receives this tape it has to be uploaded into the switch for the new feature to be activated.

This is a lengthy process that normally takes 12-14 weeks to implement from identification of feature required to feature turn up in the office.

(6) - New feature testing in live switch:

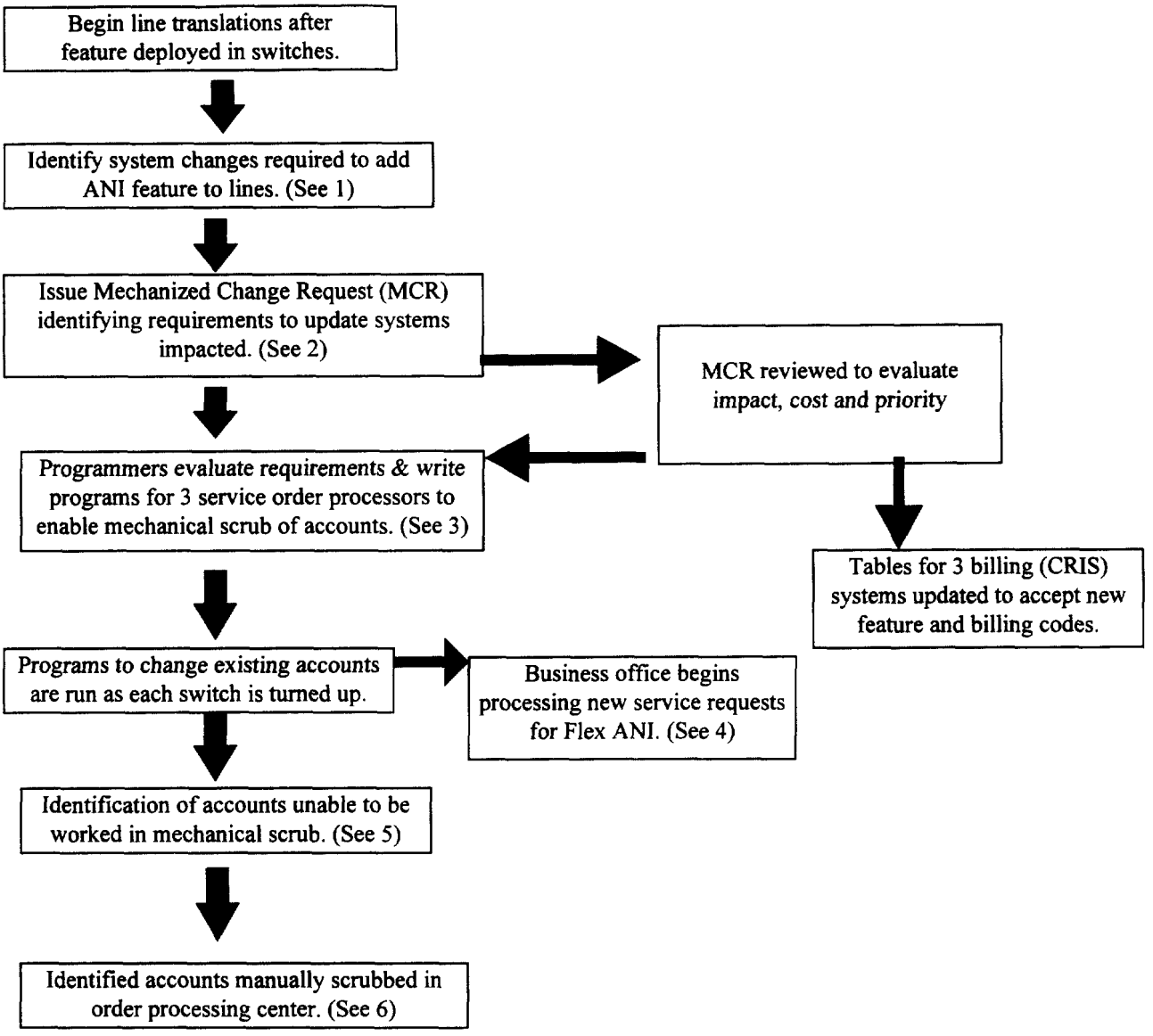
After the feature is turned up in the individual switches a small amount of testing is required in order to ensure that the feature is working properly.

(7) - Implementation of the appropriate 29 and 70 PAL Line Class Codes:

In order to build the new LCC's according to the Methods and Procedures it will take about one hour for each new LCC in every switch. It has been estimated that an average of 8 new LCC's will need to be implemented in each switch.

LINE TRANSLATIONS ORDER FLOW FOR PAYPHONE SERVICE PROVIDERS

ATTACHMENT B



Detailed information for reference steps in above flow chart.

1. The system changes required to add Flex ANI feature to lines are:
   A. Service Order Processors (SOPs): The vehicle that moves an account through U S WEST's systems so changes can be to made to customers' service. There are three SOPs in U S WEST.
   B. CRIS: The billing and record retention system for customer accounts. There are three systems in U S WEST.
2. These requirements are the rules the programmers use to make changes to the software/tables that run each system.
3. In this step, the program tells the service order processors how to identify which accounts need to be changed, and what are the specific changes that need to be made to an account. When these programs are run, thousands of accounts can be mechanically changed (or scrubbed) within hours.
4. After each switch is turned up and the existing accounts are scrubbed, the business office will be able to issue requests for new service that will provide the Flex ANI digits.
5. The accuracy rate for the mechanized scrub is anticipated to be 90%. Those accounts that do not fit within the rules of the program will be separately identified and dropped out for manual handling.
6. After the manual accounts are separately identified, personnel in the order processing centers will enter the orders into the service order processors.